

Justs N. Karlsons, No. 042899  
Matthew J. Kemner, No. 188124  
David M. Rice, No. 131064  
Jonathan Yank, No. 215495  
**CARROLL, BURDICK & McDONOUGH LLP**  
Attorneys at Law  
44 Montgomery Street, Suite 400  
San Francisco, CA 94104  
Telephone: 415.989.5900  
Facsimile: 415.989.0932  
Email: jkarlsons@cbmlaw.com  
mkemner@cbmlaw.com  
drice@cbmlaw.com  
jyank@cbmlaw.com

Attorneys for Defendant  
Specially Appearing Defendant DAIMLER AG

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SHELLEY P. ROBINSON, et al.,

Plaintiffs,

v.

DAIMLERCHRYSLER AG, et al.,

Defendants.

No. 3:07cv03258-SC

**DECLARATION OF LOUANN VAN  
DER WIELE IN SUPPORT OF  
SPECIALLY APPEARING  
DEFENDANT DAIMLER AG'S  
MOTION TO DISMISS FOR LACK OF  
PERSONAL JURISDICTION**

Date: November 30, 2007

Time: 10:00 a.m.

Courtroom: 1

Judge: Hon. Samuel Conti

I, Louann Van Der Wiele, declare as follows:

1. I am Assistant General Counsel, Product Litigation and Discovery, in the Office of the General Counsel of Chrysler LLC, formerly DaimlerChrysler Company LLC, formerly DaimlerChrysler Corporation. I have been employed in the office of the General Counsel since 1989. I have knowledge of the facts set forth in this Declaration.

1           2.     I understand that this lawsuit arises from an accident involving a 1998 Jeep Cherokee  
2 (XJ), VIN 1J4FJ68SXWL252744 (the "Cherokee").

3           3.     The Cherokee was designed, developed and assembled by Chrysler Corporation.  
4 According to Chrysler's records, the Cherokee was built on April 30, 1998, and shipped from the  
5 assembly plant on May 1, 1998. The Cherokee was sold to an authorized Jeep dealer on October  
6 7, 1998, by Chrysler Motors Corporation.

7           4.     Chrysler Corporation was incorporated in Delaware on March 4, 1986. It was  
8 responsible for the design, development and assembly of Chrysler, Dodge and Jeep vehicles.  
9

10          5.     Chrysler Motors Corporation was incorporated in Delaware on January 1, 1998. It  
11 was responsible for the sale of Chrysler, Dodge and Jeep vehicles to authorized dealers and was a  
12 wholly owned subsidiary of Chrysler Corporation.  
13

14          6.     Daimler AG (formerly DaimlerChrysler AG) is a German stock corporation  
15 incorporated under the laws of the Federal Republic of Germany in May 1998.

16          7.     Chrysler Corporation became a wholly owned subsidiary of DaimlerChrysler AG  
17 following the consummation on November 12, 1998, of the Business Combination Agreement  
18 dated May 7, 1998, as Amended and Restated, among DaimlerChrysler AG, Daimler-Benz AG,  
19 and Chrysler Corporation.  
20

21          8.     Chrysler Corporation changed its name to DaimlerChrysler Corporation and Chrysler  
22 Motors Corporation changed its name to DaimlerChrysler Motors Corporation effective  
23 November 17, 1998.

24          9.     Effective January 1, 2000, DaimlerChrysler Corporation became a wholly owned  
25 subsidiary of DaimlerChrysler North America Holding Corporation, which was a wholly owned  
26 subsidiary of DaimlerChrysler AG.  
27  
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1 10. DaimlerChrysler Motors Company LLC was formed in Delaware on September 21,  
2 2001.

3 11. Effective January 1, 2002, DaimlerChrysler Motors Corporation merged into  
4 DaimlerChrysler Motors Company LLC. DaimlerChrysler Motors Company LLC became the  
5 entity responsible for the sale of Chrysler, Dodge and Jeep vehicles to authorized dealers.  
6

7 12. Effective January 1, 2002, DaimlerChrysler Motors Company LLC also became a  
8 wholly owned subsidiary of DaimlerChrysler North America Holding Corporation, and  
9 DaimlerChrysler Corporation became a wholly owned subsidiary of DaimlerChrysler Motors  
10 Company LLC.

11 13. DaimlerChrysler Corporation and DaimlerChrysler Motors Company LLC were  
12 separate legal entities from each other and from DaimlerChrysler AG. DaimlerChrysler  
13 Corporation was responsible for making recall decisions affecting Chrysler, Dodge and Jeep  
14 vehicles.  
15

16 14. Effective March 31, 2007, DaimlerChrysler Corporation was converted to a Delaware  
17 limited liability company named DaimlerChrysler Company LLC.

18 15. Effective May 11, 2007, DaimlerChrysler Motors Company LLC became a wholly  
19 owned subsidiary of DaimlerChrysler Company LLC.  
20

21 16. Effective July 30, 2007, DaimlerChrysler Company LLC was renamed Chrysler LLC,  
22 and DaimlerChrysler Motors Company LLC was renamed Chrysler Motors LLC.

23 17. Neither Daimler AG (formerly DaimlerChrysler AG) nor the former Daimler-Benz  
24 AG designed, developed, manufactured, warranted, distributed or sold the Cherokee or any of its  
25 components  
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3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct.

5 Dated: November 15, 2007

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8 LOUANN VAN DER WIELE  
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